

**Law Offices of  
Peter Cipparulo, III, LLC**

Peter Cipparulo, III, Esq.\*

*\*Certified by the Supreme Court of New Jersey  
as a Certified Civil Trial Attorney*

349 Route 206, Suite K  
Hillsborough, NJ 08844  
Phone: (908) 275-8777  
Fax: (973) 737-1617  
Email: [petercipparulo@cipplaw.com](mailto:petercipparulo@cipplaw.com)

January 11, 2016

**VIA ECF**

Clerk, United States District Court  
402 East State Street  
Trenton, NJ 08608

RE: PORCORO v. REMEX, INC  
Docket No. MER DC 007031-15  
Our File No. 333

Dear Sir/Madam:

Enclosed please find the defendant Remex, Inc's Notice of Removal and Certification of Mailing.

A copy of this letter along with the Notice of Removal and supporting documents are being served upon counsel for the plaintiff.

Thank you for the Court's attention to this matter.

Very truly yours,



PETER CIPPARULO, III

PC/mav  
Enc.

cc: Yaakov Saks, Esq., counsel for plaintiff

LAW OFFICES OF PETER CIPPARULO, III, LLC  
349 Route 206 – Suite K  
Hillsborough, NJ 08844  
(908) 275-8777

Attorney for Defendant Remex, Inc.  
Our File No. 333

DOMINIC PORCORO,

Plaintiff,

vs.

REMEX, INC.

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MERCER COUNTY  
Special Civil Part

Docket No. 007031-15

Civil Action

**NOTICE TO THE CLERK OF THE  
SUPERIOR COURT OF NEW JERSEY  
OF REMOVAL TO FEDERAL COURT**

Pursuant to 28 U.S.C. § 1446, Defendant Remex, Inc. hereby files a copy of the Notice of Removal to Federal Court which was filed in the United States District Court for the District of New Jersey (Trenton).

Law Offices of Peter Cipparulo, III, LLC  
Attorneys for the Defendant Remex, Inc.

By

  
PETER CIPPARULO, III

Dated: January 11, 2016

LAW OFFICES OF PETER CIPPARULO, III, LLC  
349 Route 206 – Suite K  
Hillsborough, NJ 08844  
(908) 275-8777  
Attorney ID: 9431991  
Attorney for Defendant Remex, Inc.  
Our File No. 333

DOMINIC PORCORO,

Plaintiff,

vs.

REMEX, INC.

Defendant.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MERCER COUNTY  
Special Civil Part

Docket No. DC 7031-15

Civil Action

**NOTICE OF REMOVAL**

TO: CHIEF JUDGE AND JUDGES  
OF THE UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF NEW JERSEY

ON NOTICE TO:

Yaakov Saks, Esq.  
RC Law Group, PLLC  
285 Passaic Street  
Hackensack, NJ 07601  
Attorney for Plaintiff

Defendant Remex, Inc. by and through its attorneys, hereby file this Notice of Removal from the Superior Court of New Jersey, Law Division Special Civil Part, Mercer County to the United States District Court for the District of New Jersey (Trenton) and in support thereof, sets forth as follows:

1. On or about December 10, 2015 the plaintiff Dominic Porcoro filed this action bearing Docket Number DC-007031-15 alleging that defendant violated the Fair Debt Collection Act ("FDCPA"). (See Complaint, Exhibit A).

2. On December 17, 2015 the Complaint was served on the defendant.

3. This Notice of Removal complies with 28 U.S.C. § 46(b) as is filed within thirty (30) days of service of the pleading.

4. Plaintiff's Complaint is removed to the United States District Court for the District of New Jersey pursuant to 28 U.S.C. § 1331 as the claims for the alleged violations of the Fair Debt Collection Act, 15 U.S.C. § 1692, et al raise causes of action under Federal Law.

5. Written notice of this Notice of Removal shall be given to all parties as required by 28 U.S.C. § 1446(d).

Wherefore, notice is given that this action is removed from the Superior Court of New Jersey, Special Civil Part, Mercer County to the United States District Court for the District of New Jersey (Trenton).

Law Offices of Peter Cipparulo, III, LLC  
Attorneys for the Defendant Remex, Inc.

By   
PETER CIPPARULO, III

Dated: January 11, 2016

**EXHIBIT A**

FILED Dec 10, 2015

RECEIVED  
DEC 10 2015  
MERCER VICINAGE  
FINANCE DIVISION

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION SPECIAL CIVIL PART  
MERCER COUNTY**

-----X  
Dominic Porcoro

Plaintiff,

Docket No: DC-007031-15

**COMPLAINT**

( ) Cash ( ☒ ) Check  
( ) Money Order  
Fee Paid & Entered

-v.-

Remex, Inc.

Defendant.  
-----X

DEC 10 2015  
# 1815  
Amount \$ 82-  
Batch # 367  
Sue Reg  
Deputy Clerk of Superior Court

Plaintiff Dominic Porcoro ("Plaintiff" or "Porcoro") by and through his attorneys, RC Law Group, PLLC, as and for its Complaint against Defendant Remex, Inc. ("Defendant" or "Remex") respectfully sets forth, complains and alleges, upon information and belief, the following:

**INTRODUCTION/PRELIMINARY STATEMENT**

1. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of section 1692 et. seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

**PARTIES**

2. Plaintiff is a resident of the State of New Jersey, County of Passaic, residing at 41 Whitaker Avenue, 2nd Floor, Woodland Park, NJ 07424.



3. Defendant is a debt collector with an address at 307 Wall Street, Princeton, NJ 08540.

4. Remex, Inc. is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA.

#### **JURISDICTION AND VENUE**

5. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as well as 15 U.S.C. § 1692 et. seq. and 28 U.S.C. § 2201. If applicable, the Court also has pendant jurisdiction over the State law claims in this action pursuant to 28 U.S.C. § 1367(a).

6. Venue is proper in this judicial district pursuant under N.J.S.A. 6:1-3(a), because the acts and transactions occurred here, Plaintiff resides here, and Defendants transact business here.

#### **FACTUAL ALLEGATIONS**

7. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

8. On information and belief, on a date better known to Defendant, Defendant began collection activities on an alleged consumer debt from the Plaintiff ("Alleged Debt").

9. This debt was incurred as a financial obligation that was primarily for personal, family or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).

10. On or around October 1, 2015, Defendant sent Plaintiff a collection letter, that when directed to the Defendant's website to make a payment, included collection costs for credit card payments.

11. Plaintiff did not agree to such a collection charge and the \$ 7.00 collection fee far exceeds any reasonable costs of collection for this account.

12. The addition of this collection fee by Defendant, which was not authorized by the agreement creating the debt or permitted by law, was an attempt to collect an amount not owed by Plaintiff and a violation of numerous and multiple provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692e, 1692e(5), 1692e(10), 1692f, and 1692f(1).

13. As a result of Defendant's deceptive, misleading and unfair debt collection practices, Plaintiff has been damaged.

**FIRST CAUSE OF ACTION**  
**(Violations of the FDCPA)**

14. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

15. Defendant's debt collection efforts attempted and/or directed towards Plaintiff violate various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692g, 1692e, 1692e(2), 1692e(5), 1692e(10), 1692f, and 1692f(1).

16. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.



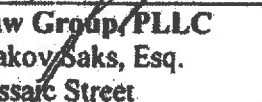


**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff Dominic Porcoro demands judgment from the Defendant Remex, Inc.,  
as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3);
- d) A declaration that the Defendant's practices violated the FDCPA; and
- e) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

Dated: Hackensack, New Jersey  
November 4, 2015

  
\_\_\_\_\_  
RC Law Group, PLLC  
By: Yaakov Saks, Esq.  
285 Passaic Street  
Hackensack, NJ 07601  
Phone: 201.282.6500 ext. 201  
Fax: 201.282.6501

### **Rule 4:51-1 Certification**

The undersigned attorney for the plaintiff certifies that the matter in controversy is not the subject of any other action pending in any Court or a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I certify that confidential person identifies have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7b.

#### **Certification**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date:

12/4/2015

Signature:

Yaakov Saks, Esq.





285 Passaic Street  
Hackensack, New Jersey 0760  
tel: 201.282.6500 x101  
fax: 201.282.6501  
ysaks@rclawgroup.com  
www.rclawgroup.com

December 2, 2015

Mercer County Courthouse  
Attention: Clerk of Special Civil Part  
400 South Warren Street  
Trenton, NJ 08608

VIA Certified Mail

Dear Sir / Madam:

Enclosed is the following:

- 1) Plaintiffs complaint;
- 2) Summons for the Defendant; and
- 3) Filing fee of \$82.

Please file the complaint and return a stamped filed copy in the enclosed envelope.

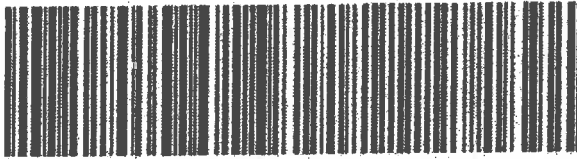
Very truly yours,

  
Yaakov Saks, Esq.

**RECEIVED**  
DEC 10 2015  
MERCER VICINAGE  
FINANCE DIVISION

USPS CERTIFIED MAIL™


MERDC00703115  
Mercer Civil Division  
PO Box 8068  
Trenton, NJ 08650-8068  
(609) 571-4483



9214 8969 0117 0400 0001 1117 66

00004 06  
REMEX INC  
307 WALL STREET  
PRINCETON NJ 08540



 <b>Court's Address and Phone Number:</b> <u>Mercer</u> <u>Special Civil Part</u> <u>400 South Warren Street</u> <u>Trenton, NJ, 08608</u>  <u>Telephone No. (609) 571-4000</u>	<b>Superior Court of New Jersey</b> <b>Law Division, Special Civil Part</b> <u>Mercer</u> <u>County</u> Docket No: DC <u>-007031-15</u>  <b>Civil Action</b> <b>SUMMONS</b> Check one <input checked="" type="checkbox"/> Contract <input type="checkbox"/> Tort										
<b>YOU ARE BEING SUED!</b>											
<b>Person or Business Suing You (Plaintiff)</b> <u>Dominic Porcino</u>  (See the following page(s) for additional plaintiffs) <b>Plaintiff's Attorney Information</b> <u>RC Law Group - Yankov Saks Esq.</u> <u>285 Passaic Street</u> <u>Hackensack, NJ, 07601</u>	<b>Person or Business Being Sued (Defendant)</b> <u>Remex, Inc.</u> <u>307 Wall Street</u> <u>Princeton, NJ, 08540</u>  (See the following page(s) for additional defendants) <b>The Person or Business Suing You Claims You Owe the Following:</b> <table style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 70%;">Demand Amount</td> <td style="width: 30%; text-align: right;">\$ 10,000.00</td> </tr> <tr> <td>Filing Fee</td> <td style="text-align: right;">\$ 75.00</td> </tr> <tr> <td>Service Fee</td> <td style="text-align: right;">\$ 7.00</td> </tr> <tr> <td>Attorney's Fees</td> <td style="text-align: right;">\$</td> </tr> <tr> <td><b>TOTAL</b></td> <td style="text-align: right;"><b>\$ 10,082.00</b></td> </tr> </table>	Demand Amount	\$ 10,000.00	Filing Fee	\$ 75.00	Service Fee	\$ 7.00	Attorney's Fees	\$	<b>TOTAL</b>	<b>\$ 10,082.00</b>
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<b>TOTAL</b>	<b>\$ 10,082.00</b>										
<b>FOR JUDICIARY USE ONLY</b>											
<p>In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.</p> <p><b>IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE <u>01/22/2016</u>, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:</b></p> <ol style="list-style-type: none"> <li>1. <b>Answer the complaint.</b> An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Clerk's Offices or on the Judiciary's Internet site <a href="http://www.njcourts.com">www.njcourts.com</a> under the section for Forms. If you decide to file an answer to the complaint made against you: <ul style="list-style-type: none"> <li>• Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: <i>Treasurer, State of New Jersey</i>. Include DC <u>-007031-15</u> (your Docket Number) on the check.</li> <li>• Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.</li> <li>• Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before <u>01/22/2016</u>.</li> </ul> </li> <li>2. <b>Resolve the dispute.</b> Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the SIGNED agreement to the court's address listed above on or before <u>01/22/2016</u>.</li> </ol> <p><b>Please Note -</b> You may wish to get an attorney to represent you. If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at <u>609-695-6249</u>. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at <u>609-585-6200</u>. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.</p>											
/s/ Name <u>Judith Irizarry</u> Acting Deputy Clerk of the Superior Court											



Dirección y teléfono del tribunal:

Parte Civil Especial de Mercer

400 South Warren Street

Trenton, NJ, 08608

Número de teléfono: (609) 571-4000

El Tribunal Superior de Nueva Jersey  
División de Derecho, Parte Civil Especial  
Condado de Mercer

Número del expediente: DC -007031-15

Demanda de Acción Civil  
NOTIFICACIÓN DE DEMANDAMarque si es ☒ Contrato ☐ Ilícito Civil**¡LE ESTÁN DEMANDANDO!****Persona o entidad comercial que le está demandando  
(el demandante)**El Demandante: Consigne la información al dorso.  
(Vea en la(s) página(s) siguiente(s) los demandantes adicionales)**Información sobre el abogado del demandante**El Demandante: Consigne al dorso la información sobre el  
abogado del demandante.**Persona o entidad comercial que está siendo  
demandada (el demandado)**El Demandante: Consigne la información al dorso.  
(Vea en la(s) página(s) siguiente(s) los demandados adicionales)La persona o entidad comercial que le está demandando  
afirma que usted le debe lo siguiente:

Cantidad a la vista	XXXXXXXXXX
Tasa judicial	XXXXXXXXXX
Cargo del emplazamiento	XXXXXXXXXX
Honorarios del abogado	XXXXXXXXXX
<b>TOTAL</b>	<b>XXXXXXXXXX</b>

**PARA USO EXCLUSIVO DEL PODER JUDICIAL**

En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. Si usted no responde a la demanda, puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado. Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.

**SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL 01/22/2016, O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:**

- 1. Responder a la demanda.** Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial [www.njcourts.com](http://www.njcourts.com) bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra:
  - Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya el número DC -007031-15 (el número de su expediente) en el cheque.
  - Envíe por correo el formulario de Respuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.
  - Entregue personalmente o envíe por correo común una copia del formulario de Respuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el 01/22/2016.
- 2. Resolver la disputa.** Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. Si llegara a un acuerdo, envíe por correo el acuerdo FIRMADO a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el 01/22/2016.


**Nota - Puede que usted quiera conseguir que un abogado para que lo represente. Si usted no puede pagar un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al 609-695-6249. Si usted puede pagar un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al 609-585-6200. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.**

/s/ Nombre y apellido

Judith Irizarry

Subsecretario(a) interino(a) del Tribunal Superior



 <p><b>Court's Address and Phone Number:</b>  <u>Morcer</u> <u>Special Civil Part</u>  <u>400 South Warren Street</u>  <u>Trenton, NJ, 08608</u>    <u>Telephone No. (609) 571-4000</u></p>	<p align="center"><b>Superior Court of New Jersey</b>  <b>Law Division, Special Civil Part</b>  <u>Morcer</u> <u>County</u>  Docket No: DC _____    <b>Civil Action</b>  <b>SUMMONS</b>  Check one <input checked="" type="checkbox"/> Contract <input type="checkbox"/> Tort</p>										
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<p><b><u>Person or Business Suing You (Plaintiff)</u></b></p> <p><u>Dominic Porcoco</u></p> <p>(See the following page(s) for additional plaintiffs)</p> <p><b><u>Plaintiff's Attorney Information</u></b></p> <p><u>RC Law Group, Yaakov Saks Esq.</u>  <u>285 Passaic Street</u>  <u>Hackensack, NJ, 07601</u></p>	<p><b><u>Person or Business Being Sued (Defendant)</u></b></p> <p><u>Remex, Inc.</u>  <u>307 Wall Street</u>  <u>Princeton, NJ, 08540</u></p> <p>(See the following page(s) for additional defendants)</p> <p><b>The Person or Business Suing You Claims You Owe the Following:</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">Demand Amount</td> <td style="width: 30%; text-align: right;">\$ 10,000.00</td> </tr> <tr> <td>Filing Fee</td> <td style="text-align: right;">\$ 75.00</td> </tr> <tr> <td>Service Fee</td> <td style="text-align: right;">\$ 7.00</td> </tr> <tr> <td>Attorney's Fees</td> <td style="text-align: right;">\$</td> </tr> <tr> <td><b>TOTAL</b></td> <td style="text-align: right;"><b>\$ 10,082.00</b></td> </tr> </table>	Demand Amount	\$ 10,000.00	Filing Fee	\$ 75.00	Service Fee	\$ 7.00	Attorney's Fees	\$	<b>TOTAL</b>	<b>\$ 10,082.00</b>
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<p>In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.</p> <p><b>IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE _____, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:</b></p> <ol style="list-style-type: none"> <li>1. <b>Answer the complaint.</b> An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Clerk's Offices or on the Judiciary's Internet site <a href="http://www.njcourts.com">www.njcourts.com</a> under the section for Forms. If you decide to file an answer to the complaint made against you: <ul style="list-style-type: none"> <li>• Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: <i>Treasurer, State of New Jersey</i>. Include DC _____ (your Docket Number) on the check.</li> <li>• Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.</li> <li>• Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before _____.</li> </ul> </li> <li>2. <b>Resolve the dispute.</b> Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the SIGNED agreement to the court's address listed above on or before _____.</li> </ol> <p><b>Please Note - You may wish to get an attorney to represent you.</b> If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at _____. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at _____. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.</p> <p align="right">/s/ Name _____  Acting Deputy Clerk of the Superior Court</p>											



Dirección y teléfono del tribunal:

Parte Civil Especial de Mercer

400 South Warren Street

Trenton, NJ, 08608

Número de teléfono: (609) 571-4000

El Tribunal Superior de Nueva Jersey  
División de Derecho, Parte Civil Especial

Condado de Mercer

Número del expediente: DC \_\_\_\_\_

Demanda de Acción Civil

NOTIFICACIÓN DE DEMANDA

Marque si es ☒ Contrato ☐ Ilícito Civil**¿LE ESTÁN DEMANDANDO!****Persona o entidad comercial que le está demandando  
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Cantidad a la vista	XXXXXXXXXX
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Cargo del emplazamiento	XXXXXXXXXX
Honorarios del abogado	XXXXXXXXXX
<b>TOTAL:</b>	<b>XXXXXXXXXX</b>

**PARA USO EXCLUSIVO DEL PODER JUDICIAL**

En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. Si usted no responde a la demanda, puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado. Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.

**SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL \_\_\_\_\_ O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:**

1. **Responder a la demanda.** Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial [www.njcourts.com](http://www.njcourts.com) bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra:
  - Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya el número DC \_\_\_\_\_ (el número de su expediente) en el cheque.
  - Envíe por correo el formulario de Respuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.
  - Entregue personalmente o envíe por correo común una copia del formulario de Respuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el \_\_\_\_\_.
2. **Resolver la disputa.** Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. Si llegara a un acuerdo, envíe por correo el acuerdo FIRMADO a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el \_\_\_\_\_.

**Nota - Puede que usted quiera conseguir que un abogado para que lo represente.** Si usted no puede pagar un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al \_\_\_\_\_. Si usted puede pagar un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al \_\_\_\_\_. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.

/s/ Nombre y apellido

Subsecretario(a) interino(a) del Tribunal Superior



REMEX, INC.

10:21:56 18 DEC 2015

			--OWING--		-RECEIVED-		ASSIGNED AMOUNTS	
CLIENT#	27385 SKIN LASER&SURGERY SPECI						--OWING--	-RECEIVED-
ACCOUNT#	1652890	AGN/AMT	112.51	0.00	PRINCIPAL		112.51	0.00
NAME	PORCORO, DOMINIC	INT	0.00	0.00	ASGN INT		0.00	0.00
NAME2		CANCELLED	112.51		COMM FEES		0.00	0.00
ADDRESS	41 WHITAKER AVE #2	ATTORNEY	0.00	0.00	AMISC1		0.00	0.00
ADDRESS2		COURT	0.00	0.00	AMISC2		0.00	0.00
CITY	LITTLE FALLS	MISC	0.00	0.00	AMISC3		0.00	0.00
ST/ZIP	NJ 07424	TOTAL***	0.00	0.00	AMISC4		0.00	0.00
PHONE					AMISC5		0.00	0.00
NOTE LNS	21	NET W/JMT**		0.00	AMISC6		0.00	0.00
DESK	SHL	STATUS: BAN COMM: AX			AMISC7		0.00	0.00
DOB	06-17-82	-- DATE --			AMISC8		0.00	0.00
SSN	135-92-4146	ASSIGNED 09-24-15			AMISC9		0.00	0.00
DRL		LAST CHG 01-29-14						
CLIENT REF#	65891	LAST PAY 07-17-13						
FWD-CLIENT		LAST ACT 12-17-15						
INT RATE(D) 0		CL LC/LP 01-29-14			MISC		0.00	0.00
PACKET#		INTR EFF 09-24-15			OVERPMT		0.00	0.00
---	SPECIAL FIELDS ---				NSF FEE		0.00	0.00
PATIENT	PORCORO, DOMINIC	SPOUSE DOB			ATTY INT		0.00	0.00
PAT DOB	06-17-82	SPOUSE SSN			MISC3		0.00	0.00
PAT SSN		MERCH/CRED			MISC4		0.00	0.00
					MISC5		0.00	0.00
					MISC6		0.00	0.00
					MISC7		0.00	0.00

## MISCELLANEOUS AMOUNTS

	--OWING--	-RECEIVED-
MISC	0.00	0.00
OVERPMT	0.00	0.00
NSF FEE	0.00	0.00
ATTY INT	0.00	0.00
MISC3	0.00	0.00
MISC4	0.00	0.00
MISC5	0.00	0.00
MISC6	0.00	0.00
MISC7	0.00	0.00

## --- TICKLER FILE ---

(1) LAST ACTION DT (/n) 12-17-15	(6) NEXT STEP
(2) COLLECTOR ACTION (7)	(7) FOLLOWUP PRIO (1-10)
(3) TIME TO WORK	(8) PROMISED PMT DATE
(4) DATE WORK AGAIN	(9) IMP NOTE LINES
(5) PROMISED PMT AMT	

## --- FINANCIAL INFORMATION --- FOR ACCOUNT 1652890

( 4) EMP1 PHN 201-489-3000  
 ( 43) INS\_ID W198461115  
 ( 44) INS1 DT/GR 84814601000001  
 ( 46) INS1 NAME AETNA  
 ( 50) INS2 ID# 900410802  
 ( 51) INS2 DT/GR 718133  
 ( 53) INS2 NAME UNITED HEALTHCARE  
 ( 82) NAME1 PH2 201-580-0858  
 ( 255) I-UF SCORE 677

## --- NOTES --- FOR ACCOUNT 1652890

\* (001) 11:33 09-30-15 BEG STRAT NOTICE-DEFAULT  
 \* (002) 11:33 09-30-15 REQ SERIES NOTICE (NOTICE-DEFAULT-23)  
 \* (003) 11:33 09-30-15 END STRAT NOTICE-DEFAULT  
 \* (004) 11:33 09-30-15 INPUT BY JJ  
 \* (005) 08:49 10-01-15 SMT NTC A1  
 \* (006) 12:06 10-01-15 RECD REVSPRING NCOA RPT - NO HIT [DTI]  
 \* (007) 17:02 10-01-15 1 Client Info page(s) added on [JJ  
 (008) (CONT) 09-30-15 Scanned by:  
 \* (009) 04:02 10-08-15 UFIND RPT REC

LAW OFFICES OF PETER CIPPARULO, III, LLC  
349 Route 206 – Suite K  
Hillsborough, NJ 08844  
(908) 275-8777  
Attorney ID: 9431991  
Attorney for Defendant Remex, Inc.  
Our File No. 333

DOMINIC PORCORO,

Plaintiff,

vs.

REMEX, INC,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MERCER COUNTY  
Special Civil Part

Docket No. 007031-15

Civil Action

**CERTIFICATION OF MAILING**

I, PETER CIPPARULO, III, Esq., certify that a true and correct copy of the foregoing  
Notice to the Clerk of the Superior Court of Removal to Federal Court was served to the  
Court by ECF and by Facsimile and Regular Mail to:

Yaakov Saks, Esq.  
RC Law Group, PLLC  
285 Passaic Street  
Hackensack, NJ 07601  
Attorney for Plaintiff

Law Offices of Peter Cipparulo, III, LLC  
Attorneys for the Defendant Remex, Inc.

By 

PETER CIPPARULO, III

Dated: January 11, 2016

**Law Offices of  
Peter Cipparulo, III, LLC**

Peter Cipparulo, III, Esq.\*

*\*Certified by the Supreme Court of New Jersey  
as a Certified Civil Trial Attorney*

349 Route 206, Suite K  
Hillsborough, NJ 08844  
Phone: (908) 275-8777  
Fax: (973) 737-1617  
Email: [petercipparulo@cipplaw.com](mailto:petercipparulo@cipplaw.com)

January 11, 2016

Mercer County Clerk's Office  
Special Civil  
175 S. Broad Street, 1<sup>st</sup> Floor  
P.O. Bo 8068  
Trenton, NJ 08650

RE: PORCORO v. REMEX, INC.  
Docket No. MER DC 7031-15  
Our File No. 333

Dear Sir/Madam:

Enclosed please find the defendant Remex, Inc.'s Notice of Removal and Certification of Mailing.

A copy of this letter along with the Notice of Removal and supporting documents are being served upon counsel for the plaintiff.

Thank you for the Court's attention to this matter.

Very truly yours,

  
PETER CIPPARULO, III

PC/mav

cc: Yaakov Saks, Esq., counsel for plaintiff